Dean Ringel Gail Johnston Andrea R. Butler CAHILL GORDON & REINDEL LLP 80 Pine Street, New York, New York Telephone: (212) 701-3000 Attorneys for Defendants Penguin Group (USA) Inc., Ian Spector and Qubefactor, Inc. UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK -----CARLOS RAY NORRIS. Civil Action No.: 07-CV-11480 a/k/a CHUCK NORRIS, an individual Plaintiff, **RULE 7.1 STATEMENT** - v -OF PENGUIN GROUP (USA) INC. PENGUIN GROUP (USA) INC., a Delaware Corporation, IAN SPECTOR, an individual and QUBEFACTOR, INC., a New York Corporation, d/b/a QUBEFACTOR TECHNOLOGIES, Defendants.

Pursuant to Fed. R. Civ. P. 7.1 and to enable judges and magistrate judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for Defendant Penguin Group (USA) Inc. certifies that Pearson, Inc. is the parent company of Penguin Group (USA) Inc. and that Pearson, Inc. is, in turn, an indirect subsidiary of Pearson plc.

Pearson plc is a United Kingdom corporation whose shares are listed on the London Stock Exchange and whose ADRs are listed on the New York Stock Exchange.

No other publicly traded corporation owns 10% or more of the stock of Penguin Group (USA) Inc.

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